

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

JOHNNIE DENHAM
Plaintiff,

HON. STEPHEN J. MURPHY
U.S. District Court Judge

-vs-

HON. R. STEVEN WHALEN
U.S. Magistrate Judge

ALBERT LORD,
PAUL D. BORJA,
BOLHOUSE, VANDER HULST, RISKO,
BAAR & LEFERE, and
WARREN C. EVANS
Defendants.

Case No. 2:09-CV-12740

**SECOND SUPPLEMENTAL BRIEF IN SUPPORT OF MOTIONS BY DEFENDANT BOLHOUSE
LAW AND MOTION BY DEFENDANT LORD TO DISMISS PLAINTIFF'S COMPLAINT**

Defendants Lord and Bolhouse Law have previously filed Motions to Dismiss Plaintiff's Complaint. Since the filing of the Motion to Dismiss, as well as these Defendants' supplemental brief, additional actions have taken place which establish Plaintiff's continued abuse of both the state and federal court systems. In Defendant Bolhouse Law's Motion to Dismiss, Bolhouse Law offered a timeline of events, numbered 1-17, of events that had taken place with respect to this matter. On December 31, 2009, these Defendants offered a supplemental pleading outlining additional events, numbered 18-27. These Defendants further supplement the timeline of events as follows:

28. December 30, 2009 - Denham again files for Chapter 13 Bankruptcy, Case # 09-79573-tjt.¹
29. December 30, 2009 – Denham files yet another Adversary Proceeding, Case Number 2:09-ap-0738.
30. January 10, 2010 – The Bankruptcy Court issues a Show Cause Order requiring Denham to appear and show cause as to why his sixth bankruptcy petition

¹ This bankruptcy filing was Debtor's sixth bankruptcy petition since 2002. Of the previous five petitions, only one resulted in a discharge.

should not be dismissed and why Denham should not be barred from filing another bankruptcy case for 180 days.

31. January 28, 2010 – the hearing on the Show Case Order was held. Denham appeared. The Court entered an Order dismissing the bankruptcy case and barred Denham from filing another bankruptcy petition, without counsel, for 180 days.
32. January 28, 2010 – Adversary Case # 2:09-ap-0738 is dismissed.

Defendants Lord and Bolhouse Law request that the Court dismiss Plaintiff's Complaint with prejudice, and award sanctions against Denham for his continued abuse of the legal system.

Respectfully submitted,

Dated: February 8, 2010

Bolhouse, Vander Hulst, Risko, Baar & Lefere, P.C.

By: /s/ Joel W. Baar
Joel W. Baar (P56796)

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Grandville MI 49418
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Attorneys for Bolhouse Law & Albert Lord

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PROOF OF SERVICE

On the date below, the undersigned, employed in the offices of Bolhouse, Vander Hulst, Risko, Baar & Lefere, P.C., sent by first-class mail a copy of:

- **SECOND SUPPLEMENTAL BRIEF IN SUPPORT OF MOTION BY DEFENDANT BOLHOUSE LAW and DEFENDANT LORD TO DISMISS PLAINTIFF'S COMPLAINT**

to:

Johnnie Denham
35816 Concord Dr.
Romulus, MI 48174

The foregoing pleading was electronically filed and notice sent to attorneys of record. I declare that the statements above are true to the best of my information, knowledge and belief.

Date: February 8, 2010

/s/ Joel W. Baar

Joel W. Baar

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